

**Jasper Lodge Sdn. Bhd.**  
**Privacy Policy**

Last Updated: [9 March, 2021]

This Privacy Policy ("**Privacy Policy**") explains how Jasper Lodge Group of Companies (Jasper Lodge Sdn. Bhd. and its subsidiaries and related companies, operating under the brand name "Jasper Lodge") ("Jasper Lodge", "we", or "us") collects, uses, shares and protects information collected through our websites, technology, applications, content, products, forms and services.

**1. Information we collect**

1.1 We may collect the following kinds of information:

- 1.1.1 Jasper Lodge collects information from you when you provide it to us. This happens when you admit a care-recipient into any of our care centres; when you enter into an agreement with us; use our services, or communicate with us, such as through our website, applications, e-mail, SMS, over the telephone or in person. The information you provide us may include information that personally identifies you ("Personal Information"), such as name, e-mail address, phone number or your mailing address. We also may collect your credit card or bank information in order to process payments. You may also provide us information about a person whose care is being managed through our services, such as that person's Personal Information which also includes medical status, physical, mental health or condition and special needs and preferences. You agree not to provide us information about any other person which may be processed by us for the purposes stated herein unless you have obtained that person's express permission.
- 1.1.2 Information you provided to our caregivers or the care-recipient may provide information to other Jasper Lodge's employees. Jasper Lodge's employees and agents will use the Personal Information to manage and communicate with you about the services that Jasper Lodge provides, including by entering information about the services and the recipient of the services into the application and websites.
- 1.1.3 Information from cookies and similar devices. Jasper Lodge uses cookies, web beacons, embedded scripts and similar methods to collect information about how users use and interact with our services through our website and applications. Cookies can also be used to remember you and your preferences. You can disable cookies through your browser settings, in which case some of the features of our services may not function properly.
- 1.1.4 Information from mobile devices when you interact with our website or applications on a mobile device, your mobile carrier may automatically send us your device and hardware ID, device type, carrier, carrier user ID, the content of your request and basic usage statistics about your device and usage of our website or applications. We do not store this information or use it for any purpose. If you provide it to us or send us a message from your mobile device, we may also collect your phone

number. Your device may also store information about your usage of our website and applications. Please consult your device documentation on how to manage local storage.

- 1.1.5 Information based on standard web protocols when you access our website through a browser or application, like other web providers, our servers automatically record certain information. This data is recorded in server logs and may include information such as your web request, your interaction with the website, the website that you were visiting when you came to our website, your Internet Protocol (IP) address, your browser type and language, the date and time of your request, and your cookie data.
- 1.1.6 Film photographs / digital photographs / motion picture footage / audio recordings ("Materials") of the care-recipient, family members of the care-recipient, or anyone else related to the care-recipient. Materials collected may appear on Jasper Lodge's social media platform, including but not limited to website, Facebook, Instagram, Google My Business, and YouTube. In the situation whereby a Material of the care-recipient, family members of the care-recipient, or anyone else related to the care-recipient is published online and wished to be removed, you may contact Jasper Lodge via [jasperlodgemarketing@gmail.com](mailto:jasperlodgemarketing@gmail.com). Necessary actions will be taken as soon as possible.
- 1.1.7 Visual images / personal appearance and behaviours / audio recordings captured by the surveillance cameras such as CCTV in our care centres. This information may be about staff, care recipients and relatives, offenders and suspected offenders, members of the public and those inside, entering or in the immediate vicinity of the area under surveillance. CCTV is used in our care centres for maintaining the security of property and premises and for preventing and investigating crime and safety related incidents. It may also be used to monitor the safety of staff, care recipients and visitors and to ensure the quality our staff's conduct and performance when carrying out their work duties.

**Commented [LPP Law1]:** Note to client: It is incumbent on the company to set out in this privacy policy how the CCTV footage may be used and disclosed in compliance with the relevant personal data protection law.

## 2. How we use the information we collect

- 2.1 Information we collect is used to provide, maintain and improve the services offered by Jasper Lodge and to perform our obligation in respect of any agreement entered into with you.
- 2.2 We also use information internally to design and develop new services.
- 2.3 We may combine information we collect from various sources to improve the efficacy of our service offerings.
- 2.4 We may perform statistical, demographic and marketing analyses, including to determine how users interact with our services, the level of interest in our services, and to customise products and services for you.
- 2.5 We may use information to contact you about the services and send you information that you have requested.

### 3. How we share the information we collect

- 3.1 Jasper Lodge may share your Personal Information or other information we collected from you with people or organisations that you authorise, including family members and people you have engaged to provide other services, such as doctors or other care providers; with any attending physicians, medical professionals or other staff of Jasper Lodge as necessary for the purpose of treatment, payment, and health care operations; with companies with whom we have contracted to provide services on our behalf, such as web hosting services, application development, analytics, security, and data processing; our advisers (including but not limited to accountants, auditors, lawyers, financial advisers or other professional advisers) on a need-to-know basis; and with companies and/or organisations that assist us in processing and/or providing services to you.
- 3.2 The companies in the above Clause 3.1 are obligated to maintain the confidentiality of any such information received from us and are restricted from using it for any purpose that is incompatible with the uses set forth in this Privacy Policy.
- 3.3 Any Personal Information provided to Jasper Lodge's subsidiaries or affiliates will be treated in accordance with the terms of this Privacy Policy.
- 3.4 Other than the disclosures permitted based on this Privacy Policy, Jasper Lodge may disclose your Personal Information or other information we collected from you where we have a good faith to believe that it is necessary to:
  - 3.4.1 satisfy any applicable law, regulation, legal process, court order or governmental requirement;
  - 3.4.2 enforce any applicable terms of our services;
  - 3.4.3 detect, prevent or otherwise address fraud, security or technical issues; or
  - 3.4.4 protect against harm to the rights, property or safety of Jasper Lodge, its partners, its users or the public.
- 3.5 Where necessary or required, information captured by our CCTV cameras may be shared with the data subjects themselves, employees and agents, service providers, police forces, security organisations and persons making an enquiry.
- 3.6 If Jasper Lodge undergoes any merger or sale of its stock or some or all of its assets, we may transfer your Personal Information and/or any other information we collected from you to the successor entity so long as it continues to maintain that information in accordance with the Privacy Policy under which it was collected.

### 4. Security and data retention

- 4.1 We recognise that data security is important and reasonable measures should be taken to protect your Personal Information from loss, misuse or unauthorised access, disclosure, alteration or destruction.
- 4.2 We apply and maintain appropriate and sufficient technical and organisational security measures to manage and protect the use and storage of records containing your and/or the care recipient's Personal Information, and this includes regularly reviewing and updating our physical and digital security, storage, and processing to ensure adherence to industry best practices governing the processing of personal data to be carried out.

- 4.3 If you believe that the Personal Information you have provided us have been compromised, or if you become aware of a potential security vulnerability in our website or application, please contact us at [hello@jasperhealth.my](mailto:hello@jasperhealth.my).
- 4.4 We will not retain any Personal Information (including CCTV recordings) for a period longer than is necessary for the fulfilment of the purpose for which it is to be processed, unless such retention of data/records/information is required by other applicable statutory provisions for a specified minimum retention duration or is otherwise according to legal obligations imposed on Jasper Lodge at law. We will take reasonable steps to ensure that such Personal Information is destroyed or permanently deleted if it is no longer required.

## 5. **Assessing and updating your information**

- 5.1 You have the right of access to your Personal Information upon payment of a prescribed fee (if applicable) and you may request that we correct any of your Personal Information which is inaccurate, incomplete or out-of date unless compliance is refused under the law. We will notify you of the reasons for not being able to accede to your request. We may also exercise our discretion in allowing the corrections requested and/or may require further documentary evidence of the new data to avoid fraud and inaccuracy.
- 5.2 You may also withdraw your consent or restrict the purposes and methods in which we process your Personal Information and the personal data relating to other persons who may be identified from your Personal Information. However, please note that notwithstanding the withdrawal of your consent, we may still process your Personal Information under circumstances permitted by law.
- 5.3 If you have any questions regarding our Privacy Policy or if you wish to request access to your Personal Information or correct your Personal Information or withdraw your consent or restrict the purposes and methods in which we process your Personal Information, you may send your request in writing to [hello@jasperhealth.my](mailto:hello@jasperhealth.my).

**Commented [LPP Law2]: Note to client:** The law also confers on data subjects the right of access to personal data about them and right to request that inaccurate data be corrected, hence we added this clause in to ensure compliance.

## 6. **Communicating with you**

- 6.1 You agree that Jasper Lodge may send you communications relating to the Jasper Lodge services.
- 6.2 The communications in the above Clause 6.1 may be through e-mail, telephone, SMS or notifications through applications.
- 6.3 You can elect not to receive certain marketing messages from Jasper Lodge by e-mail by following the instructions in the e-mail or by contacting us, but you cannot elect not to receive administrative messages relating to our services or legal matters.
- 6.4 You consent to receiving all legally-required notifications from Jasper Lodge through display on our website or application, or through the e-mail you provide to us.

## 7. **Third-party websites**

- 7.1 There may be places on our website where you may click on a link to access other websites that do not operate under this Privacy Policy.

- 7.2 The third-party websites in the above Clause 7.1 may independently solicit and collect information, including Personal Information, from you and, in some instances, provide us with information about your activities on those websites.
- 7.3 We recommend that you consult the privacy statements of all third-party websites you visit by clicking on the privacy link typically located at the bottom of the webpage you are visiting.

#### 8. Children's Personal Information

- 8.1 This website is intended for use by persons over the age of eighteen (18).
- 8.2 Jasper Lodge does not seek to collect information about children under the age of eighteen (18).
- 8.3 No information should be submitted to or posted on this website by users under eighteen (18) years of age.
- 8.4 If you believe that we might have any information from a child under age eighteen (18), please contact us at [hello@jasperhealth.my](mailto:hello@jasperhealth.my).

#### 9. Do Not Track

- 9.1 Jasper Lodge does not track its customers over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals.

#### 10. Compliance

- 10.1 We review compliance with our Privacy Policy regularly and adhere to evolving industry best-practices for protecting privacy.
- 10.2 When we receive formal written complaints, we will contact the person who made the complaint to determine whether modifications to our policies and procedures should be made.

#### 11. Changes to this Privacy Policy

- 11.1 We will occasionally update this Privacy Policy.
- 11.2 When we post changes to this Privacy Policy, we will revise the 'last updated' date at the top of this Privacy Policy.
- 11.3 We recommend that you check our website from time to time to inform yourself of any changes in this Privacy Policy or any of our other policies.
- 11.4 This Policy may be published in several languages. In the event of any conflict between different language versions, the English version shall prevail.